

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

WALTER CHOW, as Administrator of the Estate of
LEROY CHOW, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

SHOREFRONT OPERATING LLC d/b/a SEAGATE
REHABILITATION AND NURSING CENTER;
SHAINDY BERKO; ROCHEL DAVID; LEAH
FRIEDMAN; DEENA LANDA; ESTHER
FARKOVITZ; AVI PHILIPSON; BERISH
RUBINSTEIN; DAVID RUBINSTEIN; BRUSCHA
SINGER; JOEL ZUPNICK; SHOREFRONT REALTY
LLC; SENTOSACARE, LLC; and DOES 1-25,

Defendants.

Civil Action
No. 1:19-cv-03541-FB-SJB

**NOTICE OF MOTION
FOR LEAVE TO FILE AMENDED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE that plaintiff Walter Chow, as the Administrator of the Estate of Leroy Chow, individually and on behalf of all others similarly situated, moves the Court to grant him leave to file an amended class action complaint pursuant to Rules 15, 20(a)(2), and 21 of the Federal Rules of Civil Procedure. This motion is based upon this notice of motion, the accompanying memorandum of points and authorities, the declaration of John D. Sardesai-Grant, and exhibits thereto. The grounds for this motion are set forth in the accompanying Memorandum in Support, which is incorporated fully herein.

Dated: Brooklyn, New York
September 18, 2020

Respectfully Submitted,

**FINKELSTEIN, BLANKINSHIP,
FREI-PEARSON & GARBER, LLP**

By: /s/John D. Sardesai-Grant

D. Greg Blankinship
Jeremiah Frei-Pearson
John D. Sardesai-Grant
One North Broadway, Suite 900
White Plains, New York 10601
Tel: (914) 298-3281
gblankinship@fbfglaw.com
jfrei-pearson@fbfglaw.com
jsardesaigrant@fbfglaw.com

Attorneys for Plaintiff and the Putative Class

To:

Lori Semlies, Esq.
**WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER LLP**
150 East 42nd Street
New York, New York 10017
Tel.: 212-490-3000 ext.2390
lori.semlies@wilsonelser.com

David Ross, Esq.
**WILSON ELSEER MOSKOWITZ
EDELMAN & DICKER LLP**
1500 K Street, Suite 330
Washington, DC 20005
Tel.: 202-626-7660
david.ross@wilsonelser.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that on the 18th day of September, 2020, I caused a true copy of Plaintiff's Motion For Leave To File An Amended Class Action Complaint and accompanying Memorandum in Support, Declaration, and Exhibits to be served by the Court's CM/ECF system upon counsel for Defendants.

By: /s/John D. Sardesai-Grant
John D. Sardesai-Grant
**FINKELSTEIN, BLANKINSHIP,
FREI-PEARSON & GARBER, LLP**
One North Broadway, Suite 900
White Plains, New York 10601
Tel: (914) 298-3281
jsardesaigrant@fbfglaw.com